

**IN THE UNITED STATES COURT
FOR THE NORTHERN DISTRICT OF IOWA**

AD HOC COMMITTEE OF EQUITY
SECURITY HOLDERS OF VEROBLUE
FARMS and its Subsidiaries and Affiliates,

Appellant,

vs.

VEROBLUE FARMS USA, INC., ET AL.,

Appellee.

Case No. 3:19-cv-3018

APPELLANT STATEMENT OF ISSUES

1. Whether the Ad Hoc Committee of Equity Security Holders of Veroblue Farms and its subsidiaries and affiliates (“AHEC”) complied with Federal Rule of Bankruptcy Procedure 2019 in the disclosures dated: January 13, 2019 (Docket No. 247); February 27, 2019 (Docket No. 331); March 12, 2019 (Docket No. 356); and March 15, 2019 (Docket Nos. 372).

2. Notwithstanding Bankruptcy Court of the Northern District of Iowa Local Rule (“LR”) 9029-1, whether the trial erred in: (a) overruling the AHEC’s objection to an evidentiary hearing (“Hearing”), witness testimony and documentary evidence (“collectively, the “Evidence”) at the March 13, 2019, and (b) considering the Evidence in its ruling, when the Evidence was disclosed to the AHEC immediately prior to the Hearing, in violation of LR 9014-1, 9070-1, and 9073-2 and Federal Rules of Civil Procedure 26 (as made applicable by Federal Rule of Bankruptcy Procedure 7026).